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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 ROBERT GEOFFREY DAVIS,

Case No.: 2:23-cv-01208-APG-MDC

11 Petitioner,

12 vs.  
13 **UNOPPOSED MOTION FOR**  
14 **ENLARGEMENT OF TIME**  
**(FIRST REQUEST)**

GABRIELLA NAJERA, *et al.*,

Respondents

15 Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada,  
16 and Elsa Felgar, Deputy Attorney General, respectfully move this Court for an enlargement of 29-days,  
17 or up to and including June 28, 2024, in which to file and serve their response to the motion for leave to  
18 conduct discovery. ECF No. 26.

19 This motion is based on the provisions of Rule 6(b)(1)(B) of the Federal Rules of Civil Procedure  
20 and the attached Declaration of Counsel, as well as all other papers and pleadings on file herein.

21 This is Respondents' first request for an enlargement of time to file and serve their response, and  
22 this motion is made in good faith and not for the purpose of unnecessary delay.

23 RESPECTFULLY SUBMITTED this 30th day of May, 2024.

24 AARON D. FORD  
25 Attorney General

26 By: /s/ Elsa Felgar  
ELSA FELGAR (Bar No. 16076)  
27 Deputy Attorney General

## **DECLARATION OF COUNSEL**

STATE OF NEVADA )  
CARSON CITY ) : ss.

I, ELSA FELGAR, hereby state, based on personal knowledge and/or information and belief, that the assertions of this declaration are true:

1. I am a Deputy Attorney General in the Post-Conviction Division of the Nevada Attorney General's Office, and I make this declaration on behalf of Respondents' motion for enlargement of time.

2. By this motion, I am requesting a thirty (29) day enlargement of time, to and including June 28, 2024, to file a response to Petitioner's motion for leave to conduct discovery. This is the first request for enlargement of time.

3. A response in this matter is presently due May 30, 2024.

4. I have been unable with due diligence to timely complete the response. Davis filed his motion for leave to conduct discovery on May 16, 2024. ECF No. 26. Since then, I have had to focus on drafting a Ninth Circuit opening brief in *King-Hardiman v. Breitenbach*, 24-598 (9th Cir.). As such, I request a thirty (29) day enlargement of time, to and including June 28, 2024, to complete a response to Davis' motion for leave to conduct discovery.

5. This motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case.

6. I contacted Petitioner's counsel regarding this request, and he does not oppose the enlargement of time.

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1 Pursuant to 28 U.S.C. § 1746, Declarant herein certifies, under penalty of perjury, that the  
2 foregoing is true and correct.

3 Dated this 30th day of May, 2024.

4 By: /s/ Elsa Felgar  
5 ELSA FELGAR (Bar No. 16076)  
6 Deputy Attorney General

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8 **ORDER**

9 IT IS SO ORDERED.

10 Dated this 30th day of May, 2024.

11   
12 DISTRICT COURT JUDGE

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